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9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 RAMON DESAGE, aka RAMON ABI-  
RACHED, aka RAYMOND ANTOINE  
ABI-RACHED,  
16 Defendant.

2:13-CR-039-JAD-VCF

**Government's Unopposed Motion to  
Extend Time to File its Response to the  
Motion to Intervene by William  
Richardson (ECF No. 349)  
(First Request)**

ECF No. 353

17 This Motion to Extend Time is the first request. LR IA 6-1.

18 The United States of America respectfully moves this Court for an Order extending  
19 the time for the government to file its Response to the Motion to Intervene by William  
20 Richardson (ECF No. 349). The reason is the Motion with the attached exhibits is 181  
21 pages. Undersigned counsel has a large case load. The government needs more time to  
22 review the document and records to file an appropriate response while still meeting the  
23 deadlines for other assigned cases. The government now requests an extension to, and  
24 including, October 17, 2019.

25 The government discussed the extension with David Chesnoff, counsel for William  
26 Richardson, after the sentencing hearing on September 23, 2019, and he agreed to the  
27 extension of time.

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1 Because of the foregoing reasons, the government requests and extension of time to  
2 review the filed documents.

3 This Motion is not submitted solely for the purpose of delay or for any other  
4 improper purpose.

5 This Court should grant an extension of time to, and including, October 17, 2019.

6 DATED: September 26, 2019.

7 NICHOLAS A. TRUTANICH  
8 United States Attorney

9 /s/ Daniel D. Hollingsworth  
10 DANIEL D. HOLLINGSWORTH  
11 Assistant United States Attorney

12 IT IS SO ORDERED:

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15 HONORABLE JENNIFER A. DORSEY  
16 UNITED STATES DISTRICT JUDGE

17 DATED: 10/1/2019